

# Center for Constitutional Rights

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BY FAX TO (718) 260-2457

June 18, 2002

The Honorable Judge John Gleeson  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Turkmen v. Ashcroft*, CV 02-2307 (E.D.N.Y.)  
(Gleeson, J.)

Dear Judge Gleeson:

On behalf of the plaintiffs in the above-captioned suit, I respectfully request a brief extension of time to submit a response to Timothy Garren's letter of June 13th on behalf of the United States and the four named defendants in this matter requesting a pre-motion conference. Because of a fax machine problem, plaintiffs did not receive this letter until late on June 14th. Our expert on international law matters, Paul Hoffman, is arguing a case before the Ninth Circuit Court of Appeals today. In order to accommodate his schedule and the pre-existing commitments of the other attorneys for the plaintiffs, I respectfully request an extension of time until Tuesday, June 25th. Mr. Garren has kindly consented to this extension of time.

If questions arise, please call me at (212) 614-6420.

Respectfully submitted,



Nancy Chang  
Counsel for Plaintiffs

cc: Timothy Garren, Esq., DOJ (by fax to (202) 616-4314)

*The application is granted. A pre-motion  
conference will be held on July 9, 2002 at  
4:30 p.m. So ordered*

*USDJ*

*U 6-18-02*